

## **EXHIBIT G-1**

1 George J. Gerro (SBN 325168)  
2 530 S. Glenoaks Blvd., Suite 200  
3 Burbank, CA 91502  
(818) 845-3030

4 | *Self-Represented*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, BURBANK COURTHOUSE**

1           WHEREAS, this action was stayed due to the bankruptcy of Defendants BlockFi  
2 Lending LLC and BlockFi, Inc. (collectively “BlockFi”);

3           WHEREAS, on August 19, 2024, Plaintiff George Gerro (“Gerro”) filed a request for  
4 dismissal without prejudice of Defendants BlockFi Lending LLC and BlockFi, Inc. (collectively  
5 “BlockFi”);

6           WHEREAS, on August 19, 2024, the above-entitled court entered dismissal of BlockFi;

7           WHEREAS, BlockFi requests that Gerro dismiss BlockFi with prejudice;

8           WHEREAS, the subject matter of the above-entitled action is still pending before the  
9 United States Federal Court of Appeals for the Third Circuit, so dismissal with prejudice is not  
10 intended to constitute *res judicata* of the claims contained herein;

11           **IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

- 12           1. BlockFi is dismissed with prejudice, but such dismissal shall not be claim preclusive.
- 13           2. BlockFi represents that BlockFi will not argue in any forum or tribunal that its dismissal  
14 necessitates claim preclusion, and Gerro reasonably relies upon BlockFi’s representation.
- 15           3. No third-parties or privies of BlockFi may rely upon this dismissal as being claim  
16 preclusive.
- 17           4. This stipulation shall not in any manner undermine the power, jurisdiction, or ability of  
18 the United States Bankruptcy Court for the District of New Jersey, the United States District Court  
19 of New Jersey, or the United States Court of Appeals for the Third Circuit to render appropriate  
20 relief upon Gerro’s claims which are currently pending, or may be pending in the future, before  
21 those courts. Said courts shall retain the power to abstain, defer, or otherwise allow this Court to  
22 decide any remaining issues between the parties.

23  
24 DATED: September \_\_\_, 2024

HAYNES AND BOONE, LLP

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26 By: \_\_\_\_\_  
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Mark Erickson  
Attorneys for Defendants BLOCKFI  
LENDING, LLC and BLOCKFI, INC.

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2 DATED: September \_\_\_\_, 2024

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4 By:

5 George J. Gerro  
Self-Represented

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7 **GOOD CAUSE APPEARING THEREFOR,**

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9 **IT IS SO ORDERED.**

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DATED: \_\_\_\_\_

HON. FRANK M. TAVELMAN  
JUDGE OF THE SUPERIOR COURT